

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS**

|                       |   |                       |
|-----------------------|---|-----------------------|
| _____                 | ) |                       |
| PATRICIA Y. DAWSON,   | ) |                       |
|                       | ) |                       |
| Plaintiff,            | ) | No. 4:14-cv-00583-SWW |
|                       | ) |                       |
| v.                    | ) |                       |
|                       | ) |                       |
| H & H ELECTRIC, INC., | ) |                       |
|                       | ) |                       |
| Defendant.            | ) |                       |
| _____                 | ) |                       |

**JOINT MOTION FOR PROTECTIVE ORDER**

For their joint motion for the entry of a protective order, the parties state:

1. The parties have agreed to the entry of a protective order in order to safeguard information that is confidential.
2. The proposed order is attached hereto and is being separately transmitted to the Court.
3. The proposed order corrects the issue previously identified by the Court.

Wherefore, the parties jointly request that the Court enter the attached protective order.

Respectfully submitted,

/s/ John L. Burnett  
John Burnett (Arkansas Bar No. 77021)  
Lavey and Burnett  
904 West 2nd Street  
Little Rock, Arkansas 72201  
Telephone: (501) 376-2269  
E-mail: jburnett@laveyandburnett.com  
*On behalf of the Arkansas Civil Liberties Union  
Foundation, Inc.*

Ria Tabacco Mar\*  
Leslie Cooper

American Civil Liberties Union  
Foundation  
125 Broad Street  
New York, New York 10004  
Telephone: (212) 549-2627  
E-mail: rmar@aclu.org  
lcooper@aclu.org

*\* admitted pro hac vice*

*Attorneys for Plaintiff*

/s/ William P. Dougherty  
William P. Dougherty Ar Bar #73028  
Attorney at Law  
3115 Kavanaugh Blvd.  
Little Rock, AR 72205  
501-366-2125  
Bill\_2008@comcast.net

Sam Strange  
Hosto & Buchan, PLLC  
701 W. 7<sup>th</sup> St.  
Little Rock, AR 72201  
501-320-0950  
sstrange@hosto.com

*Attorneys for Defendant*